

COUNTY OF KNOX

FILED

MAY 03 2018

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICEPATTERSON V. BUCKLES et al.  
17 CV 01311 SMY-RJD  
PATTERSON V. JOHNSON et al.  
17 CV 01312-MJR-SCW

4-25-18

Affidavit

I Ricky Patterson state under oath, that I am the petitioner in the above cases - & - that I'm sending the following true statements to Honorable Judge Stephen C. Williams

Over the last week I have received defendant D. Johnson - & - defendant Laif McCarthy's Response in opposition to Plaintiff's motion for Preliminary Injunction. Through both the institutional mail - & - electronic filing. Your Honor the defendants had a professional attorney - an Assistant Attorney General - file this motion on their behalf. - & - to be totally honest I haven't a clue what to do at this moment.

As the court has also sent me a trial schedule, I'm not sure if I just wait for trial - & - then just tell my story to the jury or not. Because I have no legal skills - this is why I had the original motion prepared by a law clerk in Lawrence C.C. However do to the defendants actions against me, I was transferred out of Lawrence to Hill C.C. for my own safety. Here at Hill C.C, the civilian library staff is not a para-legal - & - the inmate clerks know hardly anything. So there is no assistance for me.

I've been granted poor man status by the court on Oct 4, 2017 - & - I've also filed two separate pre-printed forms to have counsel granted. The 2<sup>ND</sup> motion for counsel included letters from law firms who I asked for help. This was mailed to the court again on 3/1/18 (Doc# 17.) However none of my motions

for counsel have been answered as of date 5- none of my affidavits have been responded to. I'm left wondering what to do. As I wish to move forward with my claim  
 Sir I am totally lost - & - need counsel because

- 1.) There is a Dispositive Motion Re-Exhaustion of Administrative Remedies is due by May-16-2018 Please Explain what this is!
- 2.) My case has been split up into 3-or-4 cases with separate case #'s.
- 3.) Each case is before a separate Court, with separate assistant attorney generals
- 4.) The defendants filed a Response IN OPPOSITION TO PLAINTIFF'S Motion FOR PRELIMINARY INJUNCTION (I have know idea how to respond)
- 5.) I was told by an inmate clerk I have to amend my complaint - but he is not sure how to do it.
- 6.) If there is not a pre-printed federal form - there is no help for me here at Hill C.C. Thus, I'm left to file affidavit -after- affidavit
- 7.) None of my request for counsels have been responded to by the court.

8.) The issues raised against the defendants are true  
- & - can be proven with

[A.] Surveillance Footage (Video)

[B.] Inmate Witnesses

[C.] Deposition of % & Warden At Lawrence C.C.

However since I'm prisoner - I can not receive this information because of security.

9.) The defendants have a history of repeatedly violating prisoners civil rights in Lawrence. (A check of the Courts docket will show the VAST AMOUNT OF CLAIMS RAISED AGAINST the % & STAFF AT LAWRENCE-).

Judge Williams I pray that you will grant me counsel after viewing the attached 2<sup>nd</sup> motion for counsel - & the latest letters I filed - or - sent to the law firms below. The attached 2<sup>nd</sup> motion was originally filed on Nov-3-2017 by <sup>Court</sup> clerk. If given the chance Sir I can prove my case; all I request is some assistance

Respectfully

① Hinshaw & Culbertson LLP  
101 W. Vandalia St. Suite 200  
Edwardsville, Ill, 62025

② REED, ARMSTRONG, MUDGE & MORRISSEY P.C.  
115 N. BUCHANAN ST  
P.O. BOX 368  
EDWARDSVILLE, ILL, 62025

③ WITZEL, KANZLER, DIMITT & KANZEK L.L.C.  
2001 South Big Bend Blvd.  
St. Louis Mo. 63117

*[Signature]*

Picky PATERSON  
Reg # B79037  
P.O. BOX 1100  
Galesburg, Ill, 61404



*In The United States District Court  
For The Southern District of Illinois  
East St Louis Division*

*Ricky Patterson*

✓

*D. Johnson et al;  
defendants*

*CASE NO: 17-CV01312*

*Hon Judge. Stephen. C. Williams*

*Proof / Certificate of Service*

*I Ricky Patterson state that on April 26, 2018  
I placed a sworn Affidavit - 2<sup>nd</sup> Motion for appointment  
of Counsel - & - letter to court clerk into the institutional  
mail at Hill C.C. correctly addressed as follows.*

*To: :*

*HONORABLE Judge Stephen C. Williams  
United States District Court  
750 Missouri Avenue  
East ST. Louis, IL, 62201*

*1/s/ Ricky Patterson*

*Ricky PATTERSON*

*Reg # B79037*

*P.O. Box 1700*

*Galesburg, IL, 61401*

Hon. Judge Williams

Can you please explain to me what A  
Dispositive Motion RE-EXHAUSTION OF ADMINISTRATIVE REMEDIES  
is. I received notice there is a May 16-2018 deadline.

UNITED STATES DISTRICT COURT

for the  
Southern District of Illinois

**FILED**

**NOV 03 2017**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

*Ricky PATTERSON*  
Plaintiff(s)

vs.

Case Number: *17-1067, MJR*

*D. Johnson et al*  
Defendant(s)

*Plaintiff(s) Second*

**MOTION FOR RECRUITMENT OF COUNSEL**

**NOTE: Failure to complete all items in this form may result in the denial of this motion.**

1. I, *Ricky PATTERSON*, am the (check appropriate box)  
☒ plaintiff ☐ defendant in this case, I am unable to afford the services of an attorney, and I ask the Court to recruit counsel to represent me in this case. I understand that the Court will attempt to recruit counsel to represent me only if certain criteria are met.
2. I have tried to find an attorney to take my case by doing the following: **(Describe in detail everything you have done to try to get an attorney to take your case so the judge can determine whether you have made a reasonable effort to obtain representation and attach copies of any documents which show you have tried to find an attorney – use additional pages if necessary.)**

In spite of my efforts, I have been unable to find an attorney, because:

*(SEE ATTACHED.)*

3. Check the appropriate box:



I am not now, and previously have not been, represented by an attorney recruited or appointed by the Court in this or any other civil or criminal case before this Court.



I am now, or previously have been, represented by an attorney recruited or appointed by the Court in the case(s) described on the next page.



THOMAS PETERSON  
Reg# B79037  
P.O. BOX 1700  
GALESBURG, ILL, 61401

EXAMPLE OF LETTER  
TO LAW FIRMS

APRIL 10, 2018

DEAR

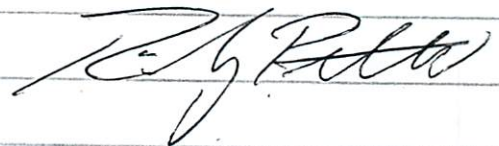
Greetings, I'm writing you today out of great urgency. I am currently in the middle of a federal 1983 claim with a Preliminary Injunction attached. These actions are taken against the officials at Lawrence C.C (WARDEN-L.T(s)-C/O(s)-& Counselor) for retaliating against me, after I exercise my right to the courts-& grievance process. I was physically assaulted by a C/O - threatened to be lynched-& raped with the actual grievances I filed. I was told I would be hung in the shower. Forced to seek protective custody from C/O(s). After a judges call, I was left with my ankles cuffed to a stool for hours (The ankle shackles were so tight they cut off all circulation to my feet- to the point it felt like tiny needles were being stuck into them.) I was left in extremely tight handcuffs in my cell (hands behind my back) after an attorneys call twice for 8 hours.

I was also thrown into segregation falsely- written three fraudulent tickets (one had to be thrown out because I could prove I was At Commissary At time of the Reported incident.) Yet the same officer continued to retaliate against me, causing me to be reclassified as a staff assaulter- due to fraudulent tickets. They further attempted to place a known suicidal mentally ill inmate into the cell with me (who had just thrown feces on several C/O(s)-& had to be taken to an outside hospital due to a suicide attempt days before)

After being thrown into segregation falsely. The trays passed to me by %o(s) were repeatedly spat in. I was so frequently cursed - & - called racial slurs - & - threatened to be killed or raped I was afraid to sleep at night - shower - or leave my cell. I truly believe if my family did not contact the State Representative who in turn learned on I.D.O.C to have me transferred. I would have been left in Lawrence - only to be found dead - Hwy!

For time sake I only listed some of the defendants horrid actions against me. However I have proof to establish my claims - & - a magistrate judge from the Northern District of Illinois is familiar with me being cuffed to a stool by the ankles for hours. I am hoping that you or your firm will be willing to represent me on this claim. My constitutional rights were grossly - violated - & - with the proof I have we can not only win this - but bring change to Lawrence C.C.

Please contact me as soon as possible with yesh-on-my. -or- with a quote for your services. I know we can win this. Very truthfully...



p.s.

I forgot to tell you the case(s) were broken into 2 they are in the U.S. District Court Southern District of Illinois...

PATTERSON V. JOHNSON 3:17-CV-01312

PATTERSON V. BUCKLES 3:17-CV-01067



4. Check the appropriate box:

- ☐ I have attached to this motion an original Application for Leave to Proceed *In Forma Pauperis* detailing my financial status.
- ☒ I previously filed an Application for Leave to Proceed *In Forma Pauperis* in this case, and it is a true and correct representation of my current financial status.
- ☐ I previously filed an Application for Leave to Proceed *In Forma Pauperis* in this case, but my financial status has changed. I have attached an Amended Application to Proceed *In Forma Pauperis* showing my current financial status.

5. The highest level of education I have completed is (check appropriate box):

- ☐ Grade school only      ☐ Some high school      ☒ High school graduate
- ☐ Some college      ☐ College graduate      ☐ Post-graduate

6. I believe that I am not able to represent myself, because

- ☐ English is not my primary language (**check only if applicable**); and/or
- ☐ I cannot speak, write, and/or read English very well because (**check only if applicable and explain**):
- ☒ Other (**please explain**): I AM A PRISONER - & the defendants ARE CORRECTIONAL officers who will need to be deposed. And the witness (INMATES) ARE IN LAWRENCE C.C. while I AM IN Hill, C.C.

7. Finally, I state that I am taking the following medications (list all medications or attach a list on a separate sheet):

8. As indicated in paragraph three on the first page of this motion, an attorney has represented me in the following cases before this Court (attach additional pages, if necessary):

Assigned Judge: \_\_\_\_\_ Case Number: \_\_\_\_\_  
Case Title: \_\_\_\_\_  
Attorney Name: \_\_\_\_\_  
If this case is still pending, please check box ☐

Assigned Judge: \_\_\_\_\_ Case Number: \_\_\_\_\_  
Case Title: \_\_\_\_\_  
Attorney Name: \_\_\_\_\_  
If this case is still pending, please check box ☐

I declare under penalty of perjury that the foregoing is true and correct.

  
Movant's Signature

10-27-17  
Date

Hill, C.C.  
P.O. 1327  
Street Address

Galesburg, Illinois, 61401  
City, State, Zip



CASE NO: 17-1067.MJR

I, Ricky PATTERSON declare that under oath that I've Repentidly written Attorneys - & lawfirms since Nov of 2016. Which was the start of this claim. This effort was done to secure counsel, because I lack the Ability to present the Violations brought Against me by the prison officials in Lawrence C.C.

These prison officials (Wardens - Lieutenants - Sergeants - C/O's - & Counselors) will need to be deposed. Along with inmates who witnessed the Actions for/lack thereof by the defendants. It will be impossible for me with the help of an inmate law-clerk - to question said witness As inmates ARE NOT permitted to contact each other from different institutions. (I was transferred to Hill C.C. on 9-6-17). Also the law clerk will not be Able to Assist me in ANY depositions since inmates who ARE pro-se (with inmate clerk assistance) don't have the Ability NOR Right to depose prison staff. Thus a vital part of the civil process will be lost, if this motion is not granted.

I know this because while in Stateville I was involved in a civil rights claim Against the health care provider Wexford Health Sources. However this entire claim was prepared - & Argued by inmate para legal MR. Patrick Pursely. Who I no longer have access to because I AM now in Hill C.C. not Stateville. Which is a MAXIMUM security prison where inmate para legals ARE familiar with 1983 civil rights claims.

However here in Hill C.C. which is a medium MAX, the inmates who work in the law library have no help on what will be a very difficult case. A case in which my life was continuously threatened - my body was threatened to be physically raped - & killed

while suffering extreme mental anguish for 10 months for no actions of my own.

I have continuously sought legal assistance and was unable to include ~~proof~~ of this in my original request for counsel, on 8-4-17 (filed before this court on 10-4-17 for reasons unknown to me; since I mailed it from Lawrence on 8-4-17)...

However on 10-18-17 - & 10-14-17 I received letters back from law firms (see attached) from

Uptown Peoples Law Center dated 10-4, 2017

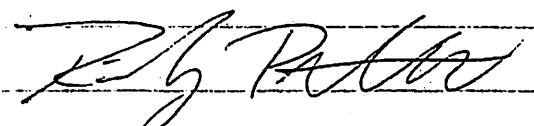
- & -

Jenner - & Block dated Oct 11, 2017

Therefore I pray you see I've continuously sought counsel, - & - see that the need for counsel in this claim is urgent. In that I lack the ability to bring it forth - & - the inmate clerks here at Hill C.C. have minimal knowledge if any with 1983 claims... The granting of this motion will cause the defendants no harm; as granting me counsel will allow the process to move forward more smoothly. Saving the court time - & - funds. The granting of this motion will also prevent future prejudice - as counsel will be able to perform depositions - question inmate witnesses - view surveillance video - & - review security documents - & - protocol that are vital to proving case # 17-1067-MJR. As a pro-se litigant with inmate assistance these documents - video - process will be deemed unavailable to me. Therefore counsel is vital to furthering this claim.

Respectfully

10-27-17







1115 North Sheridan - Chicago, Illinois 60610  
Phone: 773.769.1111 Fax: 773.769.2221  
[www.uplcchicago.org](http://www.uplcchicago.org)

October 4,, 2017

**PRIVILEGED LEGAL COMMUNICATION**

Ricky Patterson  
B79037  
Hill Correctional center  
600 Linwood Road  
P. OI. Box 1327  
Galesburg, Illinois 61401

Re: Request for Assistance

Dear Mr.Patterson

We received your letter asking for help with your civil rights case, criminal case or other matter relating to your situation in prison. Unfortunately, we are not in a position to assist you. We are a very small legal clinic. While we represent many prisoners, we get hundreds of letters asking for help, but unfortunately we can only help a very few people. For your information, we do not practice criminal law--including appeals, habeas, post convictions, etc.

Please be assured that our inability to help you does not mean that you do not have a good claim. We are forced to turn down many claims which are both morally compelling and have a sound legal basis. We simply do not have the resources to help everyone who needs help.

If your question is about a case you want to bring challenging the way you are being treated in prison, be sure that you exhaust all administrative remedies. A guide for Illinois prisoners is enclosed. We are returning any documents you sent us. *We have not kept copies.* We wish you the best of luck.

UPLC receives hundreds of letters a month, most of which describe horrific conditions or other violations of people's rights in Illinois prisons. While UPLC wishes we had the resources to take on every meritorious case, we do not. We are a small organization, with only two attorneys. We are therefore severely limited in our ability to obtain relief for individual matters.

CHICAGO LOS ANGELES NEW YORK WASHINGTON, DC

JENNER & BLOCK LLP

October 11, 2017

Ricky Patterson  
IDOC No.: B79037  
Hill Correctional Center  
P.O. Box 1700  
Galesburg, IL 61402

Dear Mr. Patterson:

I co-chair the pro bono committee at Jenner & Block. I received a copy of your letter requesting pro bono representation. However, after carefully reviewing your request, we have determined that Jenner & Block will not be able to represent you.

Each year Jenner & Block receives hundreds of requests for pro bono representation. Unfortunately, because of the tremendous volume of requests we receive, we are simply not able to undertake each one.

Sincerely,



Andrew W. Vail  
Co-Chair, Pro Bono Committee

In the  
United States District Court  
Southern District of Illinois

Ricky Patterson  
plaintiff

CASE 17-1067-MJR

v.

D. Johnson #7275 et, al;  
defendants

Proof/Certificate of Service

To: Clerk Office  
U.S. District Court  
750 Missouri Avenue  
East St. Louis, Ill, 62201

Please take notice that on Oct 27, 2017 I placed the attached documents in the mail at Hill C.C. properly addressed to the above for mailing through the U.S. Postal Service.

DATED 10-27-17

151 RJP  
Ricky Patterson

Reg # R79037

Hill C.C.

P.O. Box 1327

Galesburg, Ill, 61401



Ricky Patterson  
Reg# B79037

P.O. Box 1700

Galesburg, Ill, 61401

April 26, 2018

Dear Court Clerk,

Greetings, I'm writing your office today after receiving an electronically filed notice informing me that the defendants in my case(s) filed under PATTERSON V. JOHNSON et, Al 17CV01312-MJR-SCW - PATTERSON V. STIBBR et Al, 17CV01311 -s- PATTERSON V. Buckles et, Al 17CV01067. A Dispositive motion Re-Exhaustion of Administrative Remedies is due May-16-2018.

However I never received this motion -s- have no idea what I am to respond to. Can you please send me a copy of the defendants motion, I don't want to miss any deadlines. Also can you please inform me if there has been a ruling on on my 2<sup>nd</sup> Motion for Counsel. Thank you for your time -s- valued assistance.

Respectfully

- 1.) Copy of Defendants Motion  
Re-Exhaustion of Administrative  
Remedies

- 2.) Has 2<sup>nd</sup> Motion For Counsel Been  
Answered (Originally Mailed 4-26-18)

Ricky Patterson

Ricky PATTERSON  
REG # B79037

P.O. Box 1700

Galesburg, Ill, 61401

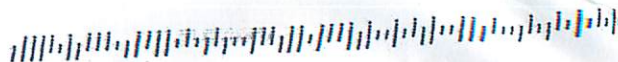
Ricky Patterson  
Reg # B79037  
P.O. Box 1700  
Halesburg, Ill, 61401

THIS CORRESPONDENCE  
IS FROM AN INMATE  
OF THE ILLINOIS  
DEPARTMENT OF CORRECTIONS

Honorable Judge Stephen C. Williams  
United States District Court  
750 Missouri Avenue  
East St. Louis, Ill, 62201

622013550 0002

Legal Mail



MAIL CLEARED  
US MARSHALS



**RECEIVED**

**MAY - 3 2018**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

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